

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CYNOSURE, LLC, a Delaware limited liability company; and LOTUS PARENT, INC., a Delaware corporation;

Plaintiffs,

v.

REVEAL LASERS LLC; a Nevada limited liability company, *et al.*

Defendants.

Civil Action No. 1:22-CV-11176-PBS

**MICHELMAN AND ROBINSON, LLP’S SUPPLEMENTAL
MOTION FOR LEAVE TO WITHDRAW**

Pursuant to Rule 83.5.2(c)(2) of the Local Rules of the United States District Court for the District of Massachusetts, Michelman & Robinson, LLP, including A. Madison Dini and Enrico Trevisani (collectively, “M&R”), files this supplemental motion to M&R’s motion to withdraw filed under seal on February 21, 2025. Pursuant to that motion, filed under seal, M&R sought to withdraw as counsel for Reveal Lasers, Ltd. And Reveal Lasers, LLC (collectively “Reveal”). By way of this supplemental motion, M&R seeks to withdraw as counsel as to all defendants that the firm currently represents, including Reveal Lasers Ltd., Reveal Lasers LLC , Robert Daley, Christopher Chambers, Brogan Bair-Chambers, Cory Murrell, Daniel DeMarco, David Krueger, Dean Fiacco, Jason Kalso, Joshua Smith, Kyle Shapero, Michael Russo, and Robert Fiacco (collectively, other than the Reveal entities, the “Individual Defendants”). In support of this Motion, M&R states as follows:

1. Under Rule 83.5.2(c)(2) of the Local Rules of the United States District Court for the District of Massachusetts, an attorney of record may withdraw as counsel for good cause

shown. “The grant or denial of an attorney’s motion to withdraw in a civil case is a matter addressed to the discretion of the trial court.” *Emerson v. Massachusetts Port Auth.*, 138 F.Supp.3d 73, 75 (D. Mass. 2015) (quoting *Lieberman v. Polytop Corp.*, 2 Fed. Appx. 37, 39 (1st Cir. 2001)). *See also Cozy, Inc. v. Dorel Juvenile Group, Inc.*, 711 F. Supp. 3d 19, 21 (D. Mass. 2024).

2. Here, professional considerations, rising to the level of good cause, as well as the requirements outlined in the Massachusetts Rules of Professional Conduct necessitate that M&R withdraw as counsel for the Reveal Defendants and Individual Defendants.

3. Since appearing in this case, M&R has acted as counsel of record for the Reveal Defendants and named individual defendants Robert Daley, Christopher Chambers, Brogan Bair-Chambers, Cory Murrell, Daniel DeMarco, David Krueger, Dean Fiacco, Jason Kalso, Joshua Smith, Kyle Shapero, Michael Russo, and Robert Fiacco. While Reveal’s and the Individual Defendants’ interests were originally sufficiently aligned to permit M&R’s joint representation under the Massachusetts Rules of Professional Conduct, recent developments between the parties mandate withdrawal not only as to the Reveal entities but as to all defendants. *See* Mass. R. Prof. C. at Rule 1.16(a)(1); *see also* Michelman & Robinson, LLP’s Motion for Leave to Withdraw, filed under seal on February 21, 2021.

4. M&R will serve a copy of this Motion to Withdraw as Counsel to the Reveal Defendants and the Individual Defendants contemporaneously with the filing of this Motion.

Dated: February 25, 2025.

Respectfully Submitted,

DEFENDANTS,

By their attorneys,

/s/ A. Madison Dini

A. Madison Dini (admitted *pro hac vice*)

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CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Reveal conferred with counsel for Plaintiffs.

/s/ A. Madison Dini

A. Madison Dini

CERTIFICATE OF SERVICE

I, A. Madison Dini, hereby certify that on February 25, 2025, a copy of the foregoing document was served on counsel for all appearing parties via the ECF filing system.

/s/ A. Madison Dini

A. Madison Dini